

## *EXHIBIT C*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

RYSTA LEONA SUSMAN, both )  
individually and as Legal Guardian of )  
SHANE ALLEN LOVELAND, et al., )  
  )  
Plaintiffs, )  
  )  
v.                                     )      Case No. 8:18-cv-00127  
  )  
THE GOODYEAR TIRE & RUBBER )  
COMPANY, )  
  )  
Defendant. )

**DECLARATION OF CLARK W. HEDGER IN SUPPORT OF  
THE GOODYEAR TIRE & RUBBER COMPANY'S  
MOTION FOR LEAVE TO AMEND ANSWER  
TO INCLUDE OHIO STATUTORY DEFENSE TO PUNITIVE DAMAGES CLAIM**

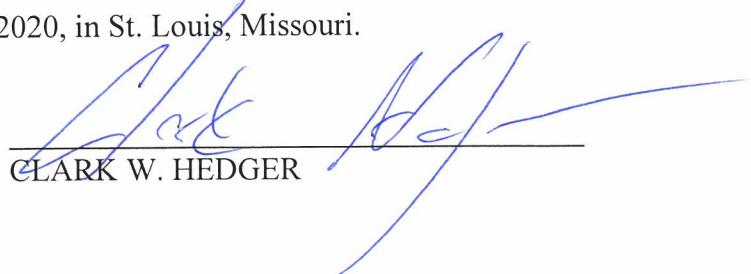
I, Clark W. Hedger, declare as follows:

1. My name is Clark W. Hedger. I understand the nature of this oath, and I am competent to testify to the matters stated in this Declaration. This testimony is based on my own personal knowledge, and the facts stated herein are true and correct.

2. True and accurate copies of the documents identified in The Goodyear Tire & Rubber Company's Motion for Leave to Amend Answer to Include Ohio Statutory Defense to Punitive Damages Claim are attached to the Index in Support of The Goodyear Tire & Rubber Company's Brief in Support of Its Motion for Leave to Amend Answer to Include Ohio Statutory Defense to Punitive Damages Claim.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 11<sup>th</sup> day of March, 2020, in St. Louis, Missouri.

  
CLARK W. HEDGER